



Performance Track Participants Association

July 14, 2003

The Honorable Erin Crotty
Commissioner
New York Department of Environmental Conservation
625 Broadway, 14th Floor
Albany, NY 12233

Dear Commissioner Crotty:

On behalf of the members of the Performance Track Participants Association (PTPA), we would like to introduce ourselves and ask for your support for EPA's Performance Track (PT) program. PTPA is a national trade association representing over 165 facilities in the PT program, including American Ref-Fuel, Ortho-Clinical Diagnostics and Lockheed Martin in New York.

PT facilities are leading by example and modeling the way to environmental excellence by using a systematic approach to managing environmental responsibilities, taking extra steps to reduce and prevent pollution, and being good corporate citizens.

The PT program was designed to recognize U.S. facilities whose environmental performance goes beyond compliance with environmental laws. The program encourages facilities not yet participating to implement strong management systems and to make performance commitments that will result in environmental benefits not achievable through the current regulatory framework. However, for this program to attract companies that have not yet met the entrance criteria, several things are essential. EPA offers recognition of these facilities, and that is a meaningful incentive to many. Others, however, are waiting to see what regulatory incentives there will be, and what the regulatory benefits of participating in a program like PT will be.

EPA has made good strides toward identifying incentive opportunities, but these will be very limited in their meaningfulness if the states do not recognize and participate in the program. We fully believe that the ability to further improve environmental performance lies in benefits accruing to those who take this approach, in the form of lessened record keeping and regulatory reporting, flexible permits, and other benefits that ease the regulatory burden of the facilities that choose to participate. We encourage you to adopt and implement this program in your state, and as a first step to implement the low inspection priority offered by the EPA to PT participants.

We look forward to hearing from you on ways we can work together to address our nation's environmental challenges. Please feel free to contact me at (314) 694-3712, PTPA's Executive Director John Flatley at (202) 296-3952, or one of the current Performance Track facilities in your state. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Klieve", is written over a light blue horizontal line.

Jeff Klieve, PTPA Chair
Director, Environmental Affairs
Monsanto Company